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February 3, 1994

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

HAND DELIVERY

William F. Caton, Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

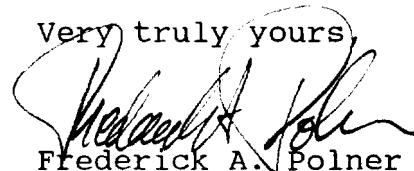
RE: PROPOSED AMENDMENT TO FM TABLE OF ALLOTMENTS
ALLOCATION OF CHANNEL 281A TO JEFFERSON CITY, MO.

Dear Mr. Caton:

Transmitted herewith for filing on behalf of Richard L. Billings are an original and four copies of his Petition for Rule Making.

If any further information is necessary or required, please contact the undersigned at the Pittsburgh office address shown above.

Very truly yours,



Frederick A. Polner

FAP/mdo

Enclosures

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

In the Matter of:)
)
Amendment of Section 73.202(b)) RM-_____
Table of Allotments)
FM Broadcast Station)
(Jefferson City, Missouri))

TO: Chief, Allocations Branch, Policy and Rules Division

PETITION FOR RULE MAKING

RICHARD L. BILLINGS ("Petitioner") by and through its undersigned counsel, FREDERICK A. POLNER, ESQUIRE, and ROTHMAN GORDON FOREMAN & GROUDINE, P.C., hereby respectfully petitions the Federal Communications Commission ("Commission") to issue a notice of proposed rule making to amend Section 73.202(b) of the Commission's rules to allocate Channel 281A at Jefferson City, Missouri. In support of his request, Petitioner offers the following:

1. Petitioner proposes the allocation of Channel 281A to Jefferson City, Missouri. Jefferson City is the capital city of the state of Missouri.

2. Attached hereto as Exhibit No. 1 and incorporated herein by reference, is the Technical Statement In Support of Petition For Rulemaking, prepared on behalf of Petitioner by Carl E. Smith Consulting Engineers (the "Technical Statement"). As demonstrated in the Technical Statement, and more fully discussed at Paragraphs 3 and 4 of this Petition, Channel 281A can be allocated to Jefferson City, Missouri, in a manner that complies with the Commission's mileage separation requirements, and creates a preferred allotment plan under the Commission's allotment priorities.

3. The proposed amendment to the Table of FM Allotments would meet the spacing requirements to all other Class A facilities requiring consideration.

4. The allocation of Channel 281A to Jefferson City would serve the public interest by maximizing the efficient use of the electromagnetic spectrum. Thus, grant of the within Petition would yield an overall allotment plan superior under the Commission's allotment priorities to the presently existing allotment.

5. Petitioner therefore respectfully requests that the Commission issue a Notice of Proposed Rule Making to amend Section 73.202(b) of the Rules as follows:

73.202 TABLE OF ALLOTMENTS

(b) Table of FM Allotments

<u>City</u>	CHANNEL NO.	
	<u>Present</u>	<u>Proposed</u>
Jefferson City,	261C2; 295C	261C2; 295C; 281A

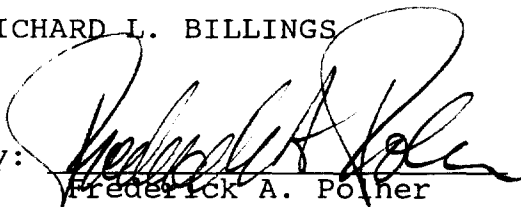
6. If Channel 281A is allocated to Jefferson City, Missouri as requested herein, Petitioner promptly will personally file or cause to be filed a construction permit application for this allocation.

WHEREFORE, Petitioner respectfully requests that the Commission's rules be amended to allocate Channel 281A to Jefferson City, Missouri.

Respectfully submitted,

RICHARD L. BILLINGS

By:


Frederick A. Polner

His Attorney

ROTHMAN GORDON FOREMAN
& GROUDINE, P.C.
Third Floor, Grant Building
Pittsburgh, PA 15219
(412) 338-1111

February 3, 1994

EXHIBIT 1

ENGINEERING STATEMENT IN
SUPPORT OF PETITION
FOR RULEMAKING
CHANNEL 281A - JEFFERSON CITY, MO
Richard L. Billings
Jefferson City, MO

January 21, 1994

Prepared for: Mr. Richard L. Billings
Radio Hill Road
Boonville, MO 65233

CARL E. SMITH CONSULTING ENGINEERS

C O N T E N T S

Title Page

Contents

Engineering Affidavit

Engineering Statement

Table 1.0 - FM Allocation Study - Channel 281A (104.1 MHz) -
Jefferson City, MO

Fig. 1.0 - Predicted Service Contours

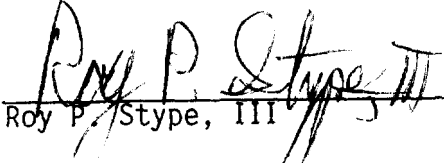
Table 1.1 - Proposed 1 mV/m Contour
Area and Population

ENGINEERING AFFIDAVIT

State of Ohio)
)
County of Summit) ss:


Roy P. Stype, III, being duly sworn, deposes and states that he is a graduate Electrical Engineer, a qualified and experienced Communications Consulting Engineer whose works are a matter of record with the Federal Communications Commission and that he is a member of the Firm of "Carl E. Smith Consulting Engineers" located at 2324 North Cleveland-Massillon Road in the Township of Bath, County of Summit, State of Ohio, and that the Firm has been retained by Richard L. Billings to prepare the attached "Engineering Statement In Support of Petition For Rulemaking - Channel 281A - Jefferson City, MO."

The deponent states that the Exhibit was prepared by him or under his direction and is true of his own knowledge, except as to statements made on information and belief and as to such statements, he believes them to be true.



Roy P. Stype, III

Subscribed and sworn to before me this **21st** day of **January, 1994**.



Notary Public

/SEAL/

ENGINEERING STATEMENT

This engineering statement is prepared on behalf of Richard L. Billings, in support of a petition for rukemaking requesting that Channel 281A be allotted to Jefferson City, Missouri, as an additional FM service. The geographic reference coordinates of Jefferson City are:

NL - 38° 34' 24"
WL - 92° 10' 06"

The studies contained in this exhibit were conducted from a site 1.5 kilometers west-southwest of these reference coordinates. The geographic coordinates of this site are:

NL - 38° 34' 00"
WL - 92° 11' 00"

Table 1.0 is an FM allocation study for Channel 281A from the site described above. As shown in this table, operation on Channel 281A from this site would meet the spacing requirements to all other facilities requiring protection consideration.

Figure 1.0 is a map exhibit showing the predicted 3.16 mV/m (city grade) and 1 mV/m (primary service) contours from the site specified above for Channel 281A in Jefferson City. These contours were projected assuming maximum Class A facilities of 6 kilowatts effective radiated power at 100 meters above average terrain utilizing terrain data from the NGDC 30 second terrain database. As shown in this figure, it will easily be possible to provide city grade service to all of Jefferson City on Channel 281A from a site which will meet all of the spacing requirements to other facilities requiring consideration. Table 1.1 presents a tabulation of the population and area within the proposed 1 mV/m contour, as depicted in Figure 1.0.

In summary, Channel 281A can be allotted to Jefferson City, Missouri,

in compliance with all applicable spacing requirements, with a site restriction 1.5 kilometers west-southwest.

TABLE 1.0

FM ALLOCATION STUDY - CHANNEL 281A (104.1 MHz) - JEFFERSON CITY, MO

RICHARD L. BILLINGS
JEFFERSON CITY, MO

STUDY COORDINATES: 38/34/00 92/11/00

STATION	LOCATION	CHANNEL	CLASS	SPACING (km)	REQUIRED SPACING*	NOTES
KNSX	Steelville, MO	227	C1	72.28	22.0	7
KNSX	Steelville, MO	227	C2	112.23	15.0	2, 3, 5
KYLC	Osage Beach, MO	228	C3	45.67	12.0	5, 10
KYLC	Osage Beach, MO	228	A	65.37	10.0	4
KTDI	Huntsville, MO	278	C2	112.99	55.0	2, 3
KTDI	Huntsville, MO	278	C1	121.23	75.0	8
KIRK	Lebanon, MO	279	C	96.55	95.0	
KMCR	Montgomery City, MO	280	A	74.59	72.0	
KCHIFM	Chillicothe, MO	280	C3	171.50	89.0	5, 10
WKKX	Jerseyville, IL	281	C2	166.11	166.0	
KZPD	Ash Grove, MO	281	A	196.95	115.0	2
KLRK	Vandalia, MO	282	A	103.57	72.0	5, 10
KDBB	Bonne Terre, MO	282	A	165.51	72.0	
KBEQFM	Kansas City, MO	282	C	207.54	165.0	
BPH920506ME	Doolittle, MO	283	A	73.63	31.0	1, 6
ALLOTMENT	Doolittle, MO	283	A	75.67	31.0	10
89-120	Northweye, MO	283	A	76.24	31.0	7
KSLQFM	Washington, MO	283	A	108.89	31.0	
KRES	Moberly, MO	284	C	108.84	95.0	

* Required Spacing Per Section 73.207 of The FCC Rules

Notes:

- | | |
|--------------------------------------|-------------------------|
| 1 - Applied For Under Section 73.215 | 6 - Pending Application |
| 2 - Construction Permit | 7 - Proposed Rulemaking |
| 3 - Channel Deletion Proposed | 8 - Rulemaking Petition |
| 4 - Move From This Channel Ordered | 9 - Short-Spaced |
| 5 - Move to This Channel Ordered | 10 - Vacant Allotment |

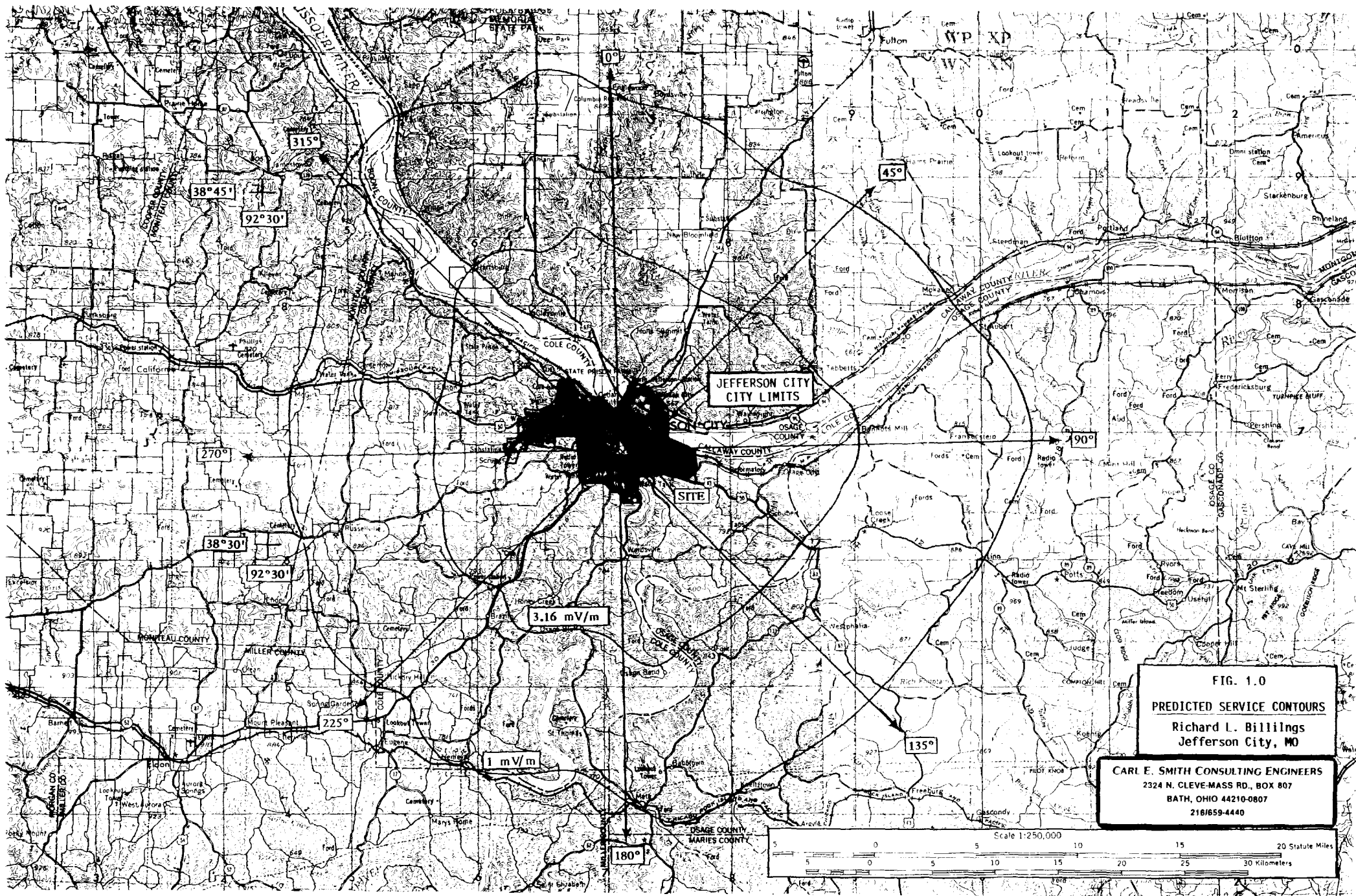


FIG. 1.0
PREDICTED SERVICE CONTOURS
Richard L. Billings
Jefferson City, MO

CARL E. SMITH CONSULTING ENGINEERS
2324 N. CLEVELAND RD., BOX 807
BATH, OHIO 44210-0807
216/659-4440

TABLE 1.1

PROPOSED 1 mV/m CONTOUR
AREA AND POPULATION

Richard L. Billings
Jefferson City, MO

Area (Square Kilometers): 2472

Population (1990 Census): 87,852